

## CASE NO. 3:17-cv-149-FDW-DCK

Defendant.

## AFFIDAVIT OF JOSH GOOSMAN

5. I did not have a job lined up when I decided to quit working at CEC. For a short while after I left CEC, I took a construction job.

6. I wanted to get back into landfill gas drilling. So, in April 2017, I called Jake Fullerton at Landmarc to see if Landmarc had an opening for a driller. Mr. Fullerton told me to submit an application and Landmarc hired me.

7. Mr. Slayton had nothing to do with my decision to work at Landmarc. I did not talk to Mr. Slayton about working at Landmarc. I did not even know Mr. Slayton was working for Landmarc until after Landmarc had hired me.

8. Mr. Slayton is not my supervisor at Landmarc, and I have not asked Mr. Slayton for any advice on drilling projects since I have been working at Landmarc. With nearly 20 years of landfill drilling experience, I know how to drill and handle obstructions without asking another driller for advice.

9. One of the projects I worked on since joining Landmarc was at Hickory Hill landfill in Ridgeland, South Carolina. CEC employee Brent Ross was one of the Construction Quality Assurance engineers on that project.

10. I recall running into one obstruction during that project. While drilling, I hit a water refusal fairly close to the target depth for the hole. A water refusal is an obstruction where excess water washes trash back into the hole and prevents further drilling. I knew how to handle the obstruction. I could have gotten through it with a special type of equipment called a water bucket. I did not have a water bucket with me, and the use of a water bucket, which results significantly higher rates, was not approved for the job. I told Mr. Ross about the issue and he called his boss, Taylor Maxwell. Mr. Maxwell said to stop drilling and to set the pipe for the well.

11. I did not call Mr. Slayton about the water refusal or otherwise regarding the drilling project I did at Hickory Hill landfill. Nor would I have needed Mr. Slayton's advice on

how to handle the water refusal. I already knew how because I had handled water obstructions lots of times during the nearly 20 years that I have done landfill drilling.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

This the 14 day of September, 2017.

Josh Goosman  
JOSH GOOSMAN

INDIANA

CLINTON COUNTY

I, Crystal Hernandez, a Notary Public do hereby certify that JOSH GOOSMAN, personally appeared before me this day and acknowledged the due execution of the foregoing Affidavit.

WITNESS my hand and official seal, this the 14 day of September, 2017.

Crystal Hernandez  
Notary Public

My Commission Expires: 9-15-23